

BAILEY, KELLEHER & JOHNSON, P. C.

ATTORNEYS AT LAW
PINE WEST PLAZA 5, SUITE 507
WASHINGTON AVENUE EXTENSION
ALBANY, NEW YORK 12205
TELEPHONE: (518) 456-0082
FACSIMILE: (518) 456-4767
www.bkjlaw.com

John W. Bailey
Nannette R. Kelleher
Thomas J. Johnson

Vincent J. DeLeonardis
Andrew T. Marciniszyn
Crystal R. Mennillo
Catherine P. Ham
Dinna Eskin-Colon
Marc J. Kaim
Aaron E. Connor
William T. Little

June 22, 2010

Via Electronic Filing
Hon. Thomas J. McAvoy
Senior U.S. District Judge
U.S. Courthouse
15 Henry Street
Binghamton, New York 13901

Re: County of Ulster et. al, v. Richard Enrique Ulloa, et. al.
Case No.: 1:10-cv-00467 (TJM/DRH)
Our File No.: 995-TR10

Dear Judge McAvoy:

Please accept the following letter as a request to consolidate the return dates with respect to two pending Motions to Dismiss filed in County of Ulster v Ulloa et al. Specifically, a Motion to Dismiss was filed by defendant Sara Ulloa on or about June 8, 2010. Defendants' response to this Motion is currently due by June 25, 2010 and Ms. Ulloa's reply to that response is due by July 1, 2010. Another Motion to Dismiss was filed, on or about June 22, 2010 by defendant Richard Enrique Ulloa. Defendants' response to this Motion is currently due by July 23, 2010 and Mr. Ulloa's reply is due July 29, 2010.

Given the fact that defendants' response to these Motions will be very similar and in many ways duplicative, it is respectfully requested that the Motion dates for the

Hon. Thomas J. McAvoy

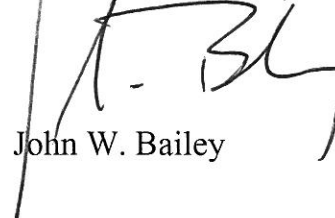
June 22, 2010

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aforementioned Motions to Dismiss be consolidated. It is also respectfully submitted that this also serves interests of judicial economy.

Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "J. Bailey", written over a vertical line.

John W. Bailey

JWB:mfv

cc: Sara Ulloa
1121 Ovington Avenue
Brooklyn, NY 11219

Richard Enrique Ulloa
22 Ridge Mountain Road
Stone Ridge, NY 12484

So Ordered

Hon. Thomas J. McAvoy